



WYOMING STOCK GROWERS ASSOCIATION

Guardian of Wyoming's Cow Country since 1872

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February 12, 2022

Patricia O'Connor
Forest Supervisor
Bridger-Teton National Forest
Jackson, WY

RE: Dell Creek/ Forest Park Elk Feedgrounds Scoping

Dear Supervisor O'Connor:

As you are well aware, the Wyoming Stock Growers Association (WSGA) is dedicated to maintaining the viability of the ranching industry across Wyoming. We appreciate this opportunity to offer comments on the reauthorization of the special use permits to Wyoming Game & Fish for the above feedgrounds.

For nearly one-half of a century these two feedgrounds, along with other G&F feedgrounds have been critical to the very survival of the cattle industry in northwestern Wyoming. Lacking the ability to maintain these feedgrounds, G&F would have been forced to drastically reduce the elk populations in this area. Should they have failed to do so, there would no longer be a viable cattle industry in northwestern Wyoming. The unavoidable outcome would have been more subdivision of private lands resulting in less open space for wildlife, recreation, and general public enjoyment.

WSGA's concerns with the loss of these feedgrounds are twofold. First, this will only increase the presence of elk on private lands during the critical winter feeding period. Second, it would inevitably lead to an increase in the transmission of brucellosis to cattle. We have been a relentless advocate for more research on brucellosis and the development of vaccines that could be effectively administered to elk. That work continues.

WSGA looks forward to the day when animal health advancements and elk management tools will combine to make it no longer necessary to maintain these elk feedgrounds. That day has not yet arrived. None of the three preliminary alternatives that you have identified will assist in reaching that desired outcome. They will only create uncertainty and hinder the collaborative efforts that are essential to progress. Furthermore, they are not consistent with meeting the multiple use objectives of the B-T Resource Management Plan

For all of the above reasons, WSGA urges you to proceed with the necessary analysis to reauthorize the Dell Creek and Forest Park feedgrounds for a new 20-year term.

Sincerely,

Jim Magagna
Executive Vice President

"Shaping and Living The Code of The West"

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